

Honorable Thomas S. Zilly

IN THE UNITED STATES DISTRICT COURT FOR THE  
WESTERN DISTRICT OF WASHINGTON  
SEATTLE DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

DAVID A. GOULD, et al.,

Defendants.

Case No. 2:16-cv-1041-TSZ

**STATUS REPORT**

The United States hereby submits this status report pursuant to the Court's Order of March 10, 2020 (Dkt. 136). That Order stayed this action to allow for progress on settlement efforts.

Counsel for the United States and counsel for Defendant Jane Polinder had a lengthy meeting on July 5, 2022. The United States believes there remain only minor issues between these two parties to resolve. Counsel for the United States still awaits further information from Ms. Polinder's counsel.

After reaching a resolution with Ms. Polinder, the United States will take steps to resolve the remainder of the case.

1 Dated: Sept. 1, 2022

Respectfully submitted,

2 DAVID HUBBERT  
3 Deputy Assistant Attorney General

4 /s/ Charles J. Butler  
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10 *Counsel for the United States of America*

**CERTIFICATE OF SERVICE**

I hereby certify that on Sept. 1, 2022, I filed the foregoing with the Clerk of Court using the CM/ECF system, which will provide electronic notice to all parties that have appeared in this action.

s/ Charles J. Butler  
CHARLES J. BUTLER  
Assistant Chief, CTS-Western  
Tax Division  
U.S. Department of Justice